

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

IN RE APPLICATION OF RIVADA)
NETWORKS PURSUANT TO 28 U.S.C. §) Civil Action No. 2:16-MC-00473-DCN
1782 TO CONDUCT DISCOVERY FOR)
USE IN FOREIGN PROCEEDINGS.,)

Plaintiff,

NOTICE OF FILING

Rivada Networks submits the attached letter to the Court explaining extent of opposition to the *Pro Hac Vice* Application of Attorney Virginia Chavez Romano.

McANGUS GOUDELOCK & COURIE, L.L.C.

s/ Dominic A. Starr
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ATTORNEYS FOR RIVADA NETWORKS

January 6, 2017

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

IN RE APPLICATION OF RIVADA
NETWORKS PURSUANT TO 28 U.S.C. §
1782 TO CONDUCT DISCOVERY FOR
USE IN FOREIGN PROCEEDINGS.,

Civil Action No. 2:16-MC-00473-DCN

Plaintiff,

CERTIFICATE OF SERVICE

vs.

Party B,

Party B Type.

I certify that on this date, I have served a copy of Notice in this action on counsel of record by

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IF Served By = "Email" Email addressed to:

IF Served By = "Email" ***IF Served By = "Facsimile"*** Facsimile to:

IF Served By = "Facsimile"; or,

IF Served By = "Other" Other: _____

IF Served By = "Other"

January 6, 2017

Date

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January 4, 2017

VIA ECF

Hon. David C. Norton
U.S. District Judge
U.S. District Court
P.O. Box 835
Charleston, SC 29402

Re: *In re Application of Rivada Networks*, 2:16-mc-00473-DCN

Dear Judge Norton:

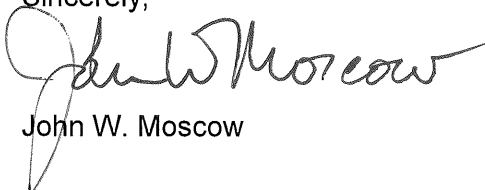
I represent Rivada Networks in this miscellaneous proceeding, and I write to explain the basis of Rivada's opposition to Virginia Chavez Romano's pending application for admission *pro hac vice*, ECF No. 16.

Rivada's opposition to the motion has nothing to do with Ms. Romano's qualifications or character. As an alumna of the United States Attorney's Office for the Southern District of New York, the New York State Attorney General's Office and the Department of Justice headquarters she is well known in New York and held in the highest regard in New York's legal community.

Rather, Rivada opposes the motion because Ms. Romano seeks to appear on behalf of Altan Redes S.A.P.I. de C.V., a third party not entitled to appear in these proceedings.

Rivada's opposition to Altan Redes's appearance in these proceedings will be articulated in its briefing on Altan Redes's motion to intervene, ECF No. 14. I submit this letter today simply to apprise the court of the limited nature of Rivada's opposition to Ms. Romano's *pro hac vice* motion.

Sincerely,



John W. Moscow

Atlanta Chicago Cincinnati Cleveland Columbus Costa Mesa Denver
Houston Los Angeles New York Orlando Philadelphia Seattle Washington, DC